

**Sierra Club, Maui Group**  
**PO Box 791180, Paia, HI 96779**

Nov 5, 2008

To; U.S. Environmental Protection Agency,  
Ground Water Office (WTR-9),  
75 Hawthorne Street, San Francisco, CA 94105,  
Attn: Nancy Rumrill

**Subject: Intent to issue an Underground injection control (UIC) permit for the Lahaina Wastewater Reclamation Facility, Lahaina, Maui**

We thank you for the opportunity to offer these comments on behalf of Sierra Club Maui Group, and its 800 members in Maui County, on the upcoming permit review for the Lahaina Wastewater Reclamation Facility in Lahaina, Maui, Hawaii.

We are grateful that the EPA has chosen to hold a public hearing on November 6<sup>th</sup> in Maui for this permit application. Sierra Club Maui has had a long history of offering suggestions to improve the wastewater disposal process at this specific facility, and our parent organization, Sierra Club Hawaii Chapter has also been involved in a number of efforts to ensure better compliance with state and federal regulations at wastewater treatment plants statewide.

For over a decade, our members have expressed concern about the continued degradation of the nearby reefs, their marine life habitat and marine water quality in this popular West Maui recreational area (referred to locally as "North Beach.")

During this time, our members have reported a decrease in native fish species, degradation of living coral formations by mats of algae and a general loss of water clarity in the area. Members who regularly recreate in those waters have also reported an increase in infections over the last number of years. They attribute these to exposure to potentially high bacterial levels in the ocean directly down gradient of the Lahaina Wastewater facility and its injection wells.

Testimony has been offered by Sierra Club volunteers over the years to specifically express the need for a better solution for treated wastewater discharge in the West Maui Region. We strongly support land-based reuse of this reclaimed water, rather than disposal through underground injection wells.

In the early 1990's the EPA issued a permit for this same facility that asked the County to reduce nitrogen levels in wastewater and to begin using the wastewater for irrigation rather than for injection. Sierra Club representatives who testified at that time, opined that there was a connection between the injected effluent and algae growth on the nearby reefs, but were told that studies proved that his was untrue.

More recent studies in Maui (USGS Kihei studies) have shown that there is a relationship between what we inject into the highly permeable ground in our coastal areas and the health of nearby marine waters, reefs and marine life. It is past time to take action to fulfill the intent of the earlier permit conditions.

For more than 15 years, progress in redirecting more of the treated effluent has been hampered by lack of political will to find the funding for necessary pipelines, storage areas and distribution infrastructure.

For example, Sierra Club members testified a few years ago to both the State Land Use Commission and the County Planning Commission, advocating that these bodies should impose conditions on a large proposed luxury development in Kapalua. These conditions would have required the development to extend reclaimed water lines when it installed its sewage hook up lines to the Lahaina treatment plant. This would have allowed the use of several mgd or more of R-1 effluent from Lahaina Wastewater Facility for the resort's extensive golf courses and lush landscaping.

This expansion of Kapalua resort development proposed over 600 new multimillion-dollar residences, but could not find funding for the one-time cost of extending the reclaimed water lines to serve their project. Instead, natural stream flows from the traditional taro growing area of Honokohau Valley, located several miles away, continue to be diverted and sent to water golf courses and resort landscapes at Kapalua, depriving that stream of life-giving waters protected under Hawaii's State Constitution. Meanwhile, sewage effluent from current Kapalua residents and hotels is sent to the Lahaina facility, treated, and then injected into the marine waters of North Beach.

In water-hungry West Maui, this is a situation that does not make ecological sense. West Maui rainfall has seen record lows over the past decade. Several major wild fires in the dry, abandoned sugar cane fields have threatened life and property. Community plans call for green belts and parks, but there is no extra potable water in West Maui to sustain this 'green infrastructure.' We cannot afford to let another 15 years pass without specific solutions to put all our potentially valuable reclaimed water resources to use for irrigation of the lands of West Maui, rather than further impairing our ocean waters.

The ocean waters of North Beach, Ka'anapali are part of a multi-million dollar resort recreation industry; provide habitat for federally listed threatened species such as green sea turtles, and are protected by clean water standards set by both the state and federal government. Local residents have commented on need to increase wastewater recycling and the lack of infrastructure needed by the Lahaina Wastewater Treatment Facility for many years. Specific and detailed comments were submitted to Congress by UH professor Ching five years ago.

We are asking this agency to put conditions on this permit which will result in a timetable for a federal-local partnership to provide infrastructure solutions for redistribution of all of the reclaimed water from Lahaina Treatment Facility to land-based uses. We also request the EPA to ensure compliance with its own Clean Water Act standards by phasing out the use of Lahaina Wastewater facility injection wells, except in emergency situations. It is time we find a way to work together and protect the health of our people, our economy and our marine environment.

Submitted on behalf of Sierra Club, Maui Group

By Lucienne de Naie  
Chairperson, Sierra Club, Hawaii Chapter